



Bowles & Johnson

February 3, 2023

**By ECF**

Hon. Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *Denson v. Donald J. Trump for President, Inc.*, No. 20 Civ. 4737 (S.D.N.Y.)  
Joint Letter regarding Intent to Settle**

Dear Judge Gardephe:

We represent Lead Plaintiff Jessica Denson, along with a putative class of similarly situated individuals, in the above-referenced action. We write this letter jointly with Defendant Donald J. Trump for President, Inc. (the “Campaign”), in response to the Court’s Order (by memo endorsement) dated January 30, 2023 (Dkt. 109).

Specifically, the parties have agreed to proceed with their motion to approve the settlement class without sealing those portions of their settlement agreement and application pertaining to attorneys’ fees and the incentive award. Consistent with this decision, the parties have executed a revised settlement agreement removing the confidentiality provision applying to attorneys’ fees and the incentive award.

We therefore submit herewith the revised proposed settlement agreement; the unredacted original letter motion, and the two proposed orders the parties’ ask the Court to enter. The parties respectfully renew the parties’ joint letter motion (Dkt. 106) to: (1) enter the proposed order provisionally certifying the class; (2) approve the settlement agreement, as modified, following a brief fairness hearing; and (3) enter the proposed order entering final, class-wide relief.

Respectfully submitted,

David K. Bowles  
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